

IN THE UNITED STATES DISTRICT COURT FOR
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

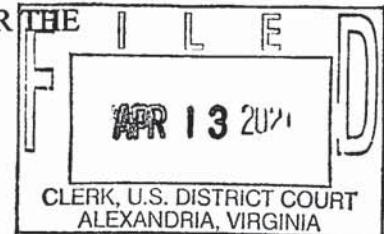
UNITED STATES OF AMERICA

v.

MOULUAN WU,

Defendant.

UNDER SEAL



Case No. 1:21-MJ-123

**AFFIDAVIT IN SUPPORT OF A CRIMINAL
COMPLAINT AND ARREST WARRANT**

I, Michael Y. Jeng, Special Agent, being duly sworn, hereby, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am employed as a Special Agent of the Federal Bureau of Investigation (“FBI”) and have been so employed since June 2, 2017. Currently, I am assigned to a squad that investigates organized criminal enterprises and is based at the Washington Field Office – Northern Virginia Resident Agency in Manassas, Virginia. As a Special Agent, I am authorized to investigate violations of laws of the United States and am authorized to execute warrants issued under the authority of the United States. My duties with the FBI include, but are not limited to: the investigation of alleged violations of Federal criminal statutes which involve financial institutions; the investigation of complex financial crimes, including extensive document review, analysis and witness interviews; and the preparation, presentation and service of criminal complaints, arrest and search warrants.

2. This affidavit is based on my personal investigation and the investigation of others, including federal and local law enforcement officials whom I know to be reliable. The facts and

information contained in this affidavit are based upon witness interviews and my review of records, documents, and other physical evidence obtained during this investigation. This affidavit does not include each and every fact known to the government, but only those facts necessary to support a finding of probable cause to support the requested Criminal Complaint.

3. I make this affidavit in support of a criminal complaint charging the defendant, MOULUAN WU (“WU”) with, from on or about June 6, 2020 to on or about March 26, 2021, in the Eastern District of Virginia and elsewhere, knowingly and intentionally conspiring and agreeing with others to commit wire fraud by knowingly devising and intending to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises; and transmitting and causing to be transmitted interstate wire communications in furtherance of the conspiracy, in violation of Title 18, United States Code, Section 1343 and Title 18, United States Code, Section 1349.

PROBABLE CAUSE

A. The Scheme to Defraud

4. This investigation was preceded by a complaint that Walmart made to the FBI in or about August of 2020. According to Walmart fraud investigators, several individuals had been redeeming a large quantity of gift cards at Walmart stores located in Northern Virginia and Maryland since on or about June 6, 2020. These gift cards, in turn, had been purchased by individuals at Walmart stores located throughout the United States. The purchasers did not have any apparent ties to the redeemers. In nearly every instance, the cards were redeemed within hours, and sometimes within minutes, of the original purchase regardless of where the purchase occurred. The redeemers then used the redeemed funds to purchase additional gift cards at Walmart stores in Northern Virginia and Maryland. The FBI began investigating these activities and was joined by Homeland

Security Investigations (“HSI”), the Fairfax County Police Department (“FCPD”), and the Department of Treasury Inspector General for Tax Administration (“TIGTA”) (collectively “Law Enforcement”).

5. Law Enforcement contacted some of the original purchasers of the redeemed gift cards and learned that they were victims of scams. For example, on or about December 15, 2020, a resident of Minnesota (“VICTIM 1”) began experiencing a computer issue. A message on VICTIM 1’s computer instructed him/her to contact a number for customer support. Upon doing so, VICTIM 1 spoke to an individual that identified himself as a Microsoft employee. The Microsoft employee informed VICTIM 1 that VICTIM 1’s computer issue was due to an outstanding payment that VICTIM 1 owed to a website and that VICTIM 1 needed to purchase \$15,500.00 in Walmart and Target gift cards to resolve the issue. VICTIM 1 was further instructed to provide the gift card numbers to the Microsoft employee over the phone. VICTIM 1 complied and the Microsoft employee attempted to have VICTIM 1 purchase additional gift cards. VICTIM 1 spoke to family members, who suspected that VICTIM 1 had been scammed, and contacted Law Enforcement about this incident.

6. In another example, on or about January 6, 2021, another individual (“VICTIM 2”), who was a resident of Tennessee, began experiencing computer issues and was instructed to contact a customer support number. Upon doing so, VICTIM 2 was informed that the customer support representative needed to remotely take control of VICTIM 2’s computer to fix it. VICTIM 2 allowed the representative to do so. VICTIM 2 was also informed that it would cost \$1,500.00 to fix the issue, but that the representative could credit this amount into to VICTIM 2’s bank account. Using the remote access, the representative showed VICTIM 2 what appeared to be VICTIM 2’s online bank account statement and that it had been credited with \$3,000.00. The representative informed

VICTIM 2 that they had mistakenly sent VICTIM 2 an additional \$1,500.00, so VICTIM 2 needed to purchase gift cards in this amount and to provide the card numbers to the representative, which VICTIM 2 did.

7. When Law Enforcement interviewed VICTIM 2, Law Enforcement informed VICTIM 2 that Law Enforcement believed an Asian individual had redeemed the gift cards VICTIM 2 purchased. VICTIM 2 indicated that they did not know any Asian individuals.

B. Evidence of WU's Participation in the Scheme

8. Walmart investigators examined surveillance footage of the redemptions and noted that the majority appeared to be conducted by three individuals. Although the redeemers wore face masks, likely due to COVID-19 safety precautions, Walmart investigators could still discern that they were the same three individuals based on distinct features such as their heights, body types, and hairlines, as well as the repeated wearing of certain clothing items.

9. Walmart investigators informed Law Enforcement that they had surveillance footage of one of the three individuals conducting redemptions from on or about June 6, 2020 to on or about March 26, 2021. According to Walmart, in that time this individual—later identified as WU by Law Enforcement—had conducted approximately 823 transactions to redeem approximately \$308,834.50 in gift cards.

10. Walmart investigators provided surveillance footage to Law Enforcement showing the redeemers, including footage that appeared to show an individual driving a Porsche Cayenne with Maryland license plate 8DY7300 on multiple instances after redeeming several gift cards. This included redemptions conducted at a Walmart located in Dulles, Virginia on or about June 11, 2020 (see Figure 1), June 14, 2020 (see Figure 2), and July 9, 2020 (see Figure 3).

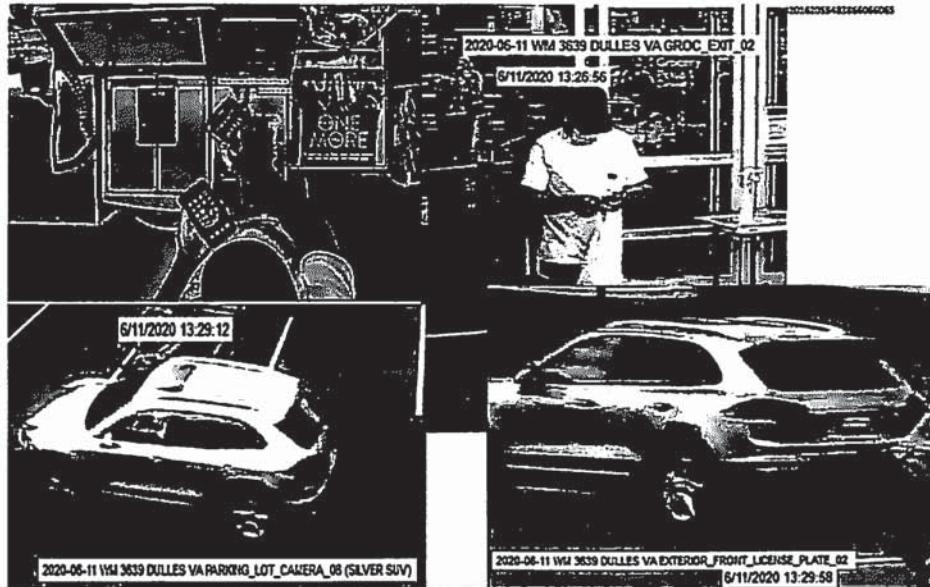


Figure 1

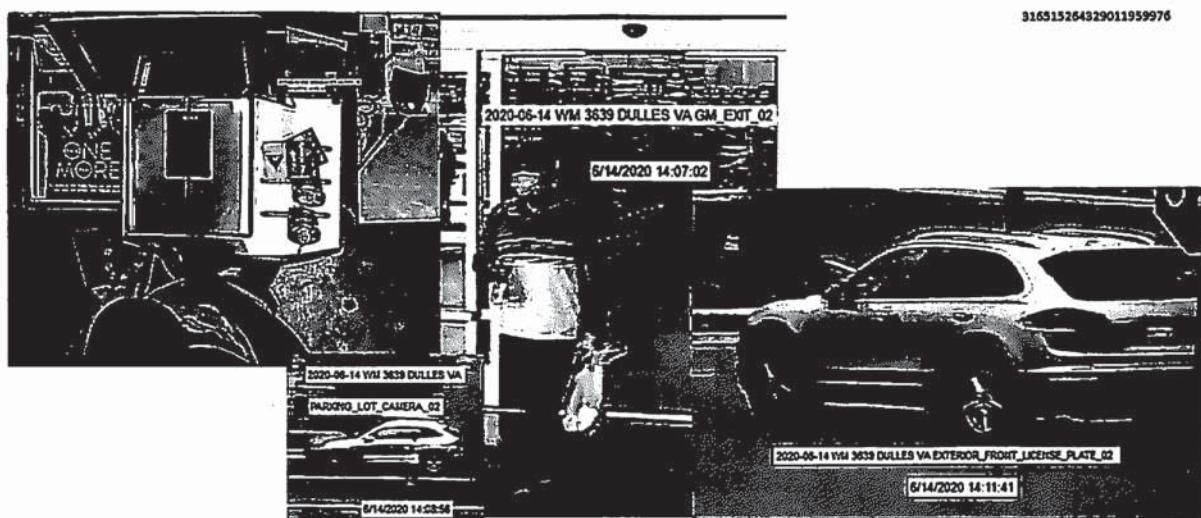


Figure 2



Figure 3

11. In all three instances, the redeemer appeared to have the same height and build and appeared to wear the same black baseball cap. Law Enforcement conducted a check of this plate with the Maryland Department of Motor Vehicles (DMV) and learned that this vehicle was registered to WU. A check of WU's driver's license photograph and height/weight description showed that WU appeared to resemble the redeemer seen in Figures 1, 2, and 3.

12. Walmart investigators reported that approximately \$1,000.00 of VICTIM 1's Walmart gift cards had been redeemed by an individual in Alexandria, Virginia on or about December 16, 2020 who matched WU's physical description and drove a Porsche sport-utility vehicle during this incident. Your affiant knows that the Porsche Cayenne registered to WU is classified as a sport-utility vehicle.

13. Other evidence provided by Walmart investigators and corroborated by Law Enforcement suggests WU participated in the gift card redemption scheme. For instance, on or about

January 1, 2021 at a Walmart located in Alexandria, Virginia, an individual that appears to be WU attempted to purchase \$300.00 in gift cards using funds redeemed from other gift cards (see Figure 4).



Figure 4

14. However, the redeemer only was able to redeem \$296.12. To cover the balance of \$3.88, the redeemer used a CITIBANK debit card ending in 6592. Walmart provided information showing that the holder's name for this card was "MOULUAN WU." Law Enforcement contacted CITIBANK, which provided further confirmation that WU was the holder of this account.

15. On or about February 4, 2021, the Westminster Police Department, which serves Westminster, Maryland, was notified by Walmart Loss Prevention that an individual was observed inside a local Walmart store placing large amounts of un-activated gift cards in his pockets as well as activating gift cards at a self-checkout counter with his cellphone. When police officers responded, they found the individual sitting inside a Porsche Cayenne bearing the Maryland license plate number 8DY7300. Officers observed the individual taking photographs of Walmart receipts with his

cellphone. Officers identified the individual as WU through identification WU was carrying and arrested him for theft of property under the value of \$100.00. The officers seized his cellphone and approximately 95 gift cards in his possession at the time of the arrest.

16. On or about February 5, 2021, a search warrant was conducted by the Westminster Police Department on WU's Porsche Cayenne. During the search, Law Enforcement located and seized approximately 2,000 more gift cards, as well as numerous Walmart receipts for gift card purchases. According to Walmart, on or about February 4, 2021, WU had redeemed approximately \$2,896.00 at a Walmart store located in Sykesville, Maryland from seven gift cards purchased in Georgia, Virginia, and Indiana. The cards were all purchased no more than two hours prior to WU redeeming them.

17. On or about March 22, 2021 at approximately 12:45pm, Walmart investigators notified Law Enforcement that WU and other co-conspirators were currently conducting gift card redemptions in a Walmart store located in Burke, Virginia. A law enforcement officer responded to this store and observed WU seated in a Porsche Cayenne with Maryland license plate 8DY7300 in the parking lot of the Walmart store (see Figure 5).



Figure 5

18. WU appeared to be using his cellphone to either take pictures of gift cards or to scan them. Later that day, the law enforcement officer observed WU inside the Walmart store wearing different clothes at the self-checkout register conducting gift card transactions (see Figure 6). Based on training and experience, your affiant knows that fraudsters often change outfits to avoid detection.

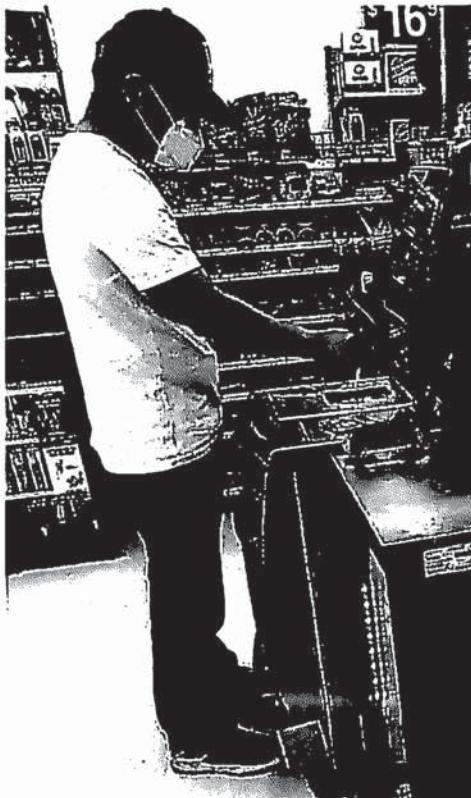


Figure 6

19. According to Walmart, on March 22, 2021, WU redeemed fifteen gift cards for a total of \$6,400.00. The cards were originally purchased at Walmart stores located in Ohio, Texas, South Carolina, Wisconsin, Tennessee, South Dakota, Pennsylvania, and Louisiana. The cards were all purchased no more than approximately two hours prior to WU redeeming them.

20. On or about April 5, 2021, Law Enforcement was notified that WU had reserved a

ticket for an international flight from Los Angeles, California to Xiamen, China that would depart on or about April 8, 2021. Law Enforcement conferred with the Westminster Police Department and was informed that WU was scheduled to appear in the District Court for Carroll County on April 20, 2021 for a hearing related to his misdemeanor arrest for theft, as referenced in Paragraph 15. WU ultimately did not appear at the airport to board his flight. On April 12, Wu attempted to board a pre-dawn flight to China but was apprehended.

CONCLUSION

21. Based on the information contained herein, I respectfully submit that there is probable cause to believe that from on or about June 6, 2020, to on or about March 26, 2021, in the Eastern District of Virginia and elsewhere, the defendant, MOULUAN WU, knowingly and intentionally conspired and agreed with others to commit wire fraud by knowingly devising and intending to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises; and by transmitting and causing to be transmitted interstate wire communications in furtherance of the conspiracy, in violation of Title 18, United States Code, Section 1343 and Title 18, United States Code, Section 1349.



Michael Jeng
Special Agent, Federal Bureau of Investigation

Reviewed by: Christopher Hood, Assistant United States Attorney

Subscribed and sworn to in accordance with
Fed. R. Crim. P. 4.1 by telephone on April 13, 2021.



/s/ _____
Ivan D. Davis
United States Magistrate Judge